

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

JOHN HANCOCK LIFE INSURANCE
COMPANY, JOHN HANCOCK
VARIABLE LIFE INSURANCE
COMPANY, and MANULIFE
INSURANCE COMPANY (f/k/a
INVESTORS PARTNER INSURANCE
COMPANY),

Plaintiffs,

v.

ABBOTT LABORATORIES,

Defendant.

CIVIL ACTION NO. 05-11150-DPW

**PLAINTIFFS' RESPONSE TO
DEFENDANT ABBOTT LABORATORIES' MOTION TO
IMPOUND ALLEGEDLY CONFIDENTIAL INFORMATION IN
SUPPLEMENTAL COMPLAINT**

Plaintiffs John Hancock Life Insurance Company, John Hancock Variable Life Insurance Company and Manulife Insurance Company (f/k/a "Investors Partner Life Insurance") (collectively, "John Hancock") hereby respond to Abbott Laboratories' ("Abbott") Motion to Impound Confidential Information in John Hancock's Supplemental Complaint, filed on June 29, 2006.

While John Hancock does not oppose Abbott's Motion, John Hancock wishes to make it clear on the record that: (1) John Hancock first submitted its proposed Supplemental Complaint to the Court, in conjunction with its Motion for Leave to File the same, on

February 3, 2006: (2) Abbott was served with a copy of John Hancock's Motion for Leave and accompanying proposed Supplemental Complaint on the same date; (3) Abbott did not object in any way to John Hancock's public filing of its proposed Supplemental Complaint, or seek to impound any of the information contained in that Supplemental Complaint, at that time or at any time during the ensuing *four months*; (4) after receiving notice that the Court had allowed John Hancock's Motion for Leave, Hancock, through its counsel, notified Abbott on June 21, 2006, that it intended to formally file its Supplemental Complaint in unredacted form; (5) Abbott did not object or otherwise respond to John Hancock's notification of June 21, 2006; and (6) John Hancock believes that, at this late date, *none* of the information in its Supplemental Complaint is sufficiently sensitive to warrant maintaining under seal.

JOHN HANCOCK LIFE INSURANCE
COMPANY, JOHN HANCOCK VARIABLE
LIFE INSURANCE COMPANY and
INVESTORS PARTNER INSURANCE
COMPANY

By their attorneys,

/s/ Brian A. Davis

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Date: July 11, 2006

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on July 11, 2006.

/s/ Brian A. Davis

Brian A. Davis